

## **REMARKS/ARGUMENTS**

In response to the Office Action dated September 19, 2006, please consider the following remarks.

In the Office Action issued September 19, 2006, claims 1, 2, 4-6, 8-10, 14, 17, and 18 were finally rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,408,659 to Cavendish et al. (Cavendish) in view of U.S. Patent No. 4,982,344 to Jordan (Jordan). Claims 7, 11-13, 16, and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Cavendish and Jordan in view of U.S. Patent No. 6,177,936 to Cragun (Cragun).

Claims 1, 2, 4-14, and 16-19 are now pending in this application. Claims 1, 8, 14, and 17 have been amended to more particularly point out the subject matter that the inventor considers to be the invention.

The applicant respectfully submits that the present invention, according to claims 1, 2, 4-6, 8-10, 14, 17, and 18 is not unpatentable over Cavendish in view of Jordan. Cavendish discloses a link pane class and application framework for use in a personal computer provided with at least two independent applications made available to a user at a graphic user interface. At the graphic user interface, a desktop located icon, one or more, is shown so that the user may easily implement the link into one or the other of the available applications. Abstract. The icon is one of several shown on the desktop, each providing different virtues or features. *See e.g.*, Col. 8, lines 15-17. An icon can be moved to a location within an open application. *See e.g.*, Col. 8, lines 17-20. The triggering of the already defined icon into action implements the function or virtue

already defined for the icon. *See e.g.*, Col. 6, lines 65-68. In particular, the only mechanism disclosed or suggested by Cavendish for causing a link to be established between an application and a function or virtue requires clicking and dragging an icon whose functions or virtues have already been defined and enabling the function or virtue to be implemented from the application. Cavendish does not disclose a mechanism for defining a link that establishes a function or virtue with an application. In short, Cavendish fails to disclose "entering a link defining mode ... and causing the processing system to define a link between the first application and the second application." Defining a link is different than establishing a link. The establishing of a link implements functionality already defined for a link.

By contrast, the present invention, for example, according to claim 1, requires causing the processing system to enter a link defining mode and displaying a second applications window, the causing of the processing system to display the second applications window causing the processing system to define a link, which specifies a relationship between the first application window and the second application window based on sequential access between the first application window and the second application window in response to displaying the second applications window, the link defining a sequence of access from the first application window to the second application window. In the present invention, the processing system defines the functionality to be implemented by the link, i.e., the link defining mode. Cavendish does not disclose or suggest defining a link since the functionality of the icons are already defined. Rather,

the Cavendish discloses clicking and dragging an icon as a necessary step in establishing a link for an icon within an application whose functionality has already been defined.

Jordan fails to cure the deficiencies of Cavendish. Jordan fails to disclose "entering a link defining mode ... and causing the processing system to define a link between the first application and the second application." Thus, the combination of Cavendish and Jordan still does not disclose or suggest this claimed feature of the present invention.

Thus, the present invention, according to claim 1, and according to claims 8, 14 and 17, which are similar to claim 1, and according to claims 2, 4-6, 9-10, and 18, which depend therefrom, is not unpatentable over by Cavendish in view of Jordan.

The applicant respectfully submits that the present invention, according to claims 7, 11-13, 16, and 19 is not unpatentable over Cavendish in view of Jordan and in further view of Cragun. Cragun also fails to cure the deficiencies of Cavendish and Jordan.

Thus, the present invention, according to claim 1, and according to claims 7, 11, 16, and 19, and according to claims 12-13, which depend from claim 11, is not unpatentable over Cavendish in view of Jordan and Cragun.

Each of the claims now pending in this application is believed to be in condition for allowance. Accordingly, favorable reconsideration of this case and early issuance of the Notice of Allowance are respectfully requested.

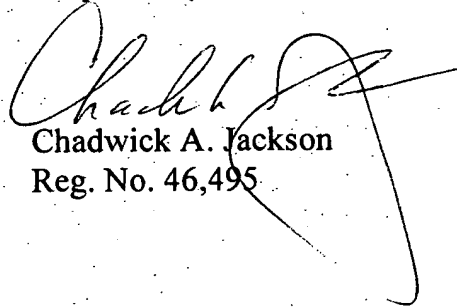
**Additional Fees:**

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with this application to Deposit Account No. 19-5127 (19111.0055).

**Conclusion**

In view of the foregoing, all of the Examiner's rejections to the claims are believed to be overcome. The Applicants respectfully request reconsideration and issuance of a Notice of Allowance for all the claims remaining in the application. Should the Examiner feel further communication would facilitate prosecution, he is urged to call the undersigned at the phone number provided below.

Respectfully Submitted,



Chadwick A. Jackson  
Reg. No. 46,495

**COPY**

Dated: March 6, 2007

Bingham McCutchen LLP  
2020 K Street, N.W.  
Washington, D.C. 20007  
(202) 373-6661